



SEEK Limited ACN 080 075 314

SEEK Group Gifts and Entertainment Policy

March 2017

1. Background and Purpose

Gifts and entertainment of a modest value are commonly used to strengthen business relationships and are permitted by SEEK Limited ("SEEK") and its subsidiary companies (collectively the "SEEK Group" or the "Group") in certain circumstances.

This SEEK Group Gifts and Entertainment Policy (the "Policy") sets out the Group's requirements in relation to offering, providing or accepting gifts and entertainment to or from Third Parties or Officials.

2. Definitions

In this Policy the following words or phrases mean the following:

Country Limit means the monetary limit for gifts and entertainment that is set for a country by the Local Compliance Officer with responsibility for that country.

Entertainment includes meals, accommodation, sporting and cultural events and other social gatherings. Entertainment should be treated as a gift if the party who made the offer does not plan on attending.

Gift means anything of value, whether given or received directly or indirectly, including prizes, promotions, tokens of appreciation, preferential discounts, services, donations to charities, use of vacation facilities, travel, tickets and gifts certificates.

Gifts and Entertainment Guidelines are guidelines specific to each SEEK Group company which, among other things, set the limits around the acceptance and offer of gifts and entertainment for the business and include practical examples specific to each jurisdiction.

Gifts and Entertainment Register means the register maintained by each SEEK Group company to record all gifts and entertainment offered and received.

Personnel means all persons acting on behalf of the SEEK Group at all levels, including officers, directors, employees, temporary staff and contractors of the Group.

Official means a Government Official, political party, official or officer of a political party or candidate for political office.

Third Party means any individual or organisation other than Officials, with whom Personnel come into contact during the course of their employment or business relationships associated with the SEEK Group.

3. Scope

This Policy applies to all Personnel when offering and receiving gifts and entertainment to and from Officials or Third Parties (including situations where Personnel use personal funds to provide gifts and entertainment on behalf of the SEEK Group).

Internal gifts and entertainment within the Group are not covered by this Policy

This Policy supplements the SEEK Group Anti-Bribery and Anti-Corruption Policy.

4. Responsibility for Policy Compliance

The Group Company Secretary is the Compliance Officer for SEEK and the SEEK Group (the “SEEK Compliance Officer”), and is responsible for the overall administration of this Policy. The SEEK Compliance Officer will monitor the implementation of this Policy and will review this Policy in conjunction with the SEEK Group Anti-Bribery and Anti-Corruption Policy.

In addition to the SEEK Compliance Officer, each subsidiary outside Australia within the SEEK Group has a designated employee who is responsible for monitoring and applying this Policy as the compliance officer for that business (“Local Compliance Officer”).

5. Consequences of Breaching this Policy

This Policy supplements the SEEK Group Anti-Bribery and Anti-Corruption Policy. If SEEK or one of its subsidiaries is found to have taken part in bribery or any other related improper conduct addressed by this Policy and the SEEK Group Anti-Bribery and Anti-Corruption Policy, it could face a fine and suffer reputational harm. An individual may be subject to penalties or lengthy terms of imprisonment.

Breach of this Policy by Personnel could be regarded as serious misconduct, leading to disciplinary action which may include termination of employment.

6. Policy

A. Giving or receiving gifts or entertainment

- Cash and cash equivalent (eg gift vouchers) must never be offered or accepted as a gift.
- Gifts and entertainment should only be offered for genuine business purposes.
- Gifts and entertainment should be appropriate to the occasion/circumstances and in proportion relative to the importance of the customer or business relationship and must not be offered, given or received in circumstances that could be considered to give rise to undue influence.

-
- Personnel must never request a gift or entertainment from a Third Party.
 - Gifts and entertainment must only be offered or accepted in compliance with any relevant government law, regulation, rule, or code.
 - If the value of a gift or entertainment exceeds the Country Limit (see your local Gifts and Entertainment Guidelines), Personnel must receive prior approval in writing (which can include email) and record it in the Gifts and Entertainment Register.

B. Books and records

All gifts and entertainment provided to, or received from, Officials or Third Parties must be accurately and transparently recorded in the Gifts and Entertainment Register.

Accurate receipts must be obtained for all gifts and entertainment provided on behalf of the SEEK Group, and all records must be retained in accordance with the SEEK Group's policies.

C. Reporting Violations and Suspected Misconduct

If you are in any doubt as to the appropriateness of any gift or entertainment, you should consult your Local Compliance Officer before it is offered, given or accepted or otherwise as soon as possible.

Any Personnel or stakeholder who believes that a contravention of this Policy or any laws has occurred, or will occur, should report the matter immediately to their Local Compliance Officer or use the procedure set out in the SEEK Group Whistleblower Policy. A copy of the SEEK Group Whistleblower Policy can be found on the SEEK website, the intranet or obtained from your Local Compliance Officer.